



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 7-3512-00030/00023

Renewal Number: 2

02/01/2016

Facility Identification Data

Name: OSWEGO HARBOR POWER

Address: 261 WASHINGTON BLVD

OSWEGO, NY 13126

Owner/Firm

Name: OSWEGO HARBOR POWER LLC

Address: 261 WASHINGTON BLVD

OSWEGO, NY 13126, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: ELIZABETH A TRACY

Address: 615 ERIE BLVD WEST

SYRACUSE, NY 13204-2400

Phone:3154267438

Division of Air Resources:

Name: THOMAS A ELTER

Address: 615 ERIE BLVD WEST

SYRACUSE, NY 13204

Air Permitting Contact:

Name: JAMES WALSH

Address: OSWEGO HARBOR POWER LLC

261 WASHINGTON BLVD

OSWEGO, NY 13126-1751

Phone:3153492365

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This permit action is to renew the Title V operating permit for the facility. This action will include conditions for federal regulations promulgated since the last renewal.

Attainment Status

OSWEGO HARBOR POWER is located in the town of OSWEGO in the county of OSWEGO.

The attainment status for this location is provided below. (Areas classified as attainment are those that

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meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

Oswego Harbor Power is an electric power producer and includes the following equipment:

1. Unit 5 - (Emission Unit 5) This unit is capable of firing natural gas or oil, and its maximum heat input is 7,840 mmBTU/hr.
2. Unit 6 - (Emission Unit 6) This unit is capable of firing natural gas or oil, and its maximum heat input is 7,840 mmBTU/hr.
3. Unit 9 - (Emission Unit 9) This unit is a package boiler capable of firing natural gas or oil (residual or distillate). The maximum heat input is 78.3 mmBTU/hr firing natural gas and 74.9 mmBTU/hr firing oil.
4. Unit 10 - (Emission Unit 10) This unit is a package boiler used for station heating capable of firing natural gas or distillate oil. The maximum heat input is 90.5 mmBTU/hr.
5. The facility has four residual oil storage tanks with a capacity of 16,254,000 gallons each.
6. The facility operates a feeder, at the water treatment plant, that delivers a caustic or lime solution.

Permit Structure and Description of Operations

The Title V permit for OSWEGO HARBOR POWER

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots)



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are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

OSWEGO HARBOR POWER is defined by the following emission unit(s):

Emission unit U00006 -

Emission unit U00006 is associated with the following emission points (EP):
00006

Process: P61 is located at 1, Building 1 -

Process: P62 is located at 1, Building 1 -

Emission unit U00007 -

Emission unit U00007 is associated with the following emission points (EP):
000T1, 000T2, 000T3, 000T4

Process: PT1

Process: PT2

Process: PT3

Process: PT4

Emission unit U00008 -

Emission unit U00008 is associated with the following emission points (EP):
00008

Process: PLS is located at Building 2 -

Emission unit U00009 -

Emission unit U00009 is associated with the following emission points (EP):
00009

Process: P91 is located at 1, Building 1 -

Process: P92 is located at 1, Building 1 -

Emission unit U00010 -

Emission unit U00010 is associated with the following emission points (EP):
00010

Process: GAS is located at FLOOR 1, Building 1 -

Process: OIL is located at FLOOR 1, Building 1 -

Emission unit U00005 -

Emission unit U00005 is associated with the following emission points (EP):
00005



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Title V/Major Source Status

OSWEGO HARBOR POWER is subject to Title V requirements. This determination is based on the following information:

The facility is major for PM, NO_x, SO₂, CO, VOC and HAPs.

Program Applicability

The following chart summarizes the applicability of OSWEGO HARBOR POWER with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	YES
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.



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NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

4911

ELECTRIC SERVICES

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

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SCC Code	Description
1-01-004-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - RESIDUAL OIL Grade 6 Oil: Normal Firing
1-01-006-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - NATURAL GAS Boilers > 100 MBtu/Hr except Tangential
1-01-007-02	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - PROCESS GAS Boilers < 100 MBTU/HR
1-02-005-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-05-104-96	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS UNLOADING OPERATION Chemical: Specify in Comments
3-90-900-06	IN-PROCESS FUEL USE IN-PROCESS FUEL USE - FUEL STORAGE - FIXED ROOF TANKS OIL NO. 6: WORKING LOSS

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	> 0	but < 10 tpy
000091-57-6	2-METHYL NAPHTHALENE	> 0	but < 2.5 tpy

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000056-49-5	3-METHYLCHOLANTHRENE	> 0 but < 2.5 tpy
0NY507-00-0	40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS	> 0 but < 10 tpy
000057-97-6	7,12- DIMETHYLBENZ [A] ANTHRA CENE	> 0 but < 2.5 tpy
000083-32-9	ACENAPHTHENE	> 0 but < 10 tpy
000208-96-8	ACENAPHTHYLENE	> 0 but < 10 tpy
000120-12-7	ANTHRACENE	> 0 but < 10 tpy
007440-38-2	ARSENIC	> 0 but < 10 tpy
000071-43-2	BENZENE	> 0 but < 10 tpy
000056-55-3	BENZO (A) ANTHRACENE	> 0 but < 10 tpy
000050-32-8	BENZO (A) PYRENE	> 0 but < 10 tpy
000205-99-2	BENZO [B] FLUORANTHENE	> 0 but < 10 tpy
000191-24-2	BENZO [G, H, I] PERYLENE	> 0 but < 10 tpy
000207-08-9	BENZO [K] FLUORANTHENE	> 0 but < 10 tpy
007440-41-7	BERYLLIUM	> 0 but < 10 tpy
007440-43-9	CADMIUM	> 0 but < 10 tpy
000124-38-9	CARBON DIOXIDE	>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy but < 75,000 tpy
016887-00-6	CHLORIDE ION CL-	> 0 but < 2.5 tpy
007782-50-5	CHLORINE	> 0 but < 10 tpy
007440-47-3	CHROMIUM	> 0 but < 10 tpy
000218-01-9	CHRYSENE	> 0 but < 10 tpy
007440-48-4	COBALT	>= 10 tpy
000053-70-3	DIBENZ [A, H] ANTHRACENE	> 0 but < 10 tpy
025321-22-6	DICHLOROBENZENE	> 0 but < 2.5 tpy
000100-41-4	ETHYLBENZENE	> 0 but < 10 tpy
000206-44-0	FLUORANTHENE	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE	>= 10 tpy
000110-54-3	HEXANE	>= 10 tpy
007647-01-0	HYDROGEN CHLORIDE	>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE	>= 10 tpy
000193-39-5	INDENO [1, 2, 3- CD] PYRENE	> 0 but < 10 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
007439-97-6	MERCURY	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy but < 75,000 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
000085-01-8	PHENANTHRENE	> 0 but < 10 tpy
007723-14-0	PHOSPHORUS (YELLOW)	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
001336-36-3	POLYCHLORINATED BIPHENYL	> 0 but < 10 tpy
000129-00-0	PYRENE	> 0 but < 10 tpy
007782-49-2	SELENIUM	> 0 but < 10 tpy
0NY035-16-0	SULFUR (S 035)	>= 250 tpy but < 75,000 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY100-00-0	TOTAL HAP	>= 250 tpy but < 75,000 tpy
0NY998-00-0	VOC	>= 250 tpy but <

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75,000 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
 - (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)



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Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or



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the environment to stop the emission of air pollutants causing or contributing to such pollution;

- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official



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Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6
NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
-- FACILITY	ECL 19-0301	112	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A	29	General provisions
U-00006	40CFR 60-D.43 (a) (1)	87	Sulfur Dioxide Standard: for liquid fossil fuel or liquid fossil fuel and wood residue.
U-00006	40CFR 60-D.44 (a) (1)	88	Standards of Nitrogen Oxides for Gaseous Fossil Fuel
U-00006	40CFR 60-D.44 (a) (2)	89	Standard of Nitrogen Oxides Liquid Fossil Fuel
U-00006	40CFR 60-D.44 (b)	90	Standard of Nitrogen



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U-00010/-/OIL	40CFR 60-Dc.42c (h)	102	Oxide for Multiple Fossil Fuels Exemption from Averaging Requirements
U-00010/-/OIL	40CFR 60-Dc.42c (i)	103	Standard for Sulfur Dioxide Period of Requirements.
U-00010/-/OIL	40CFR 60-Dc.43c (c)	104	Standard for Opacity.
U-00010/-/OIL	40CFR 60-Dc.43c (d)	105	Time Period Requirements for Opacity
U-00010/-/OIL	40CFR 60-Dc.44c (h)	106	Alternative Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.
U-00010/-/OIL	40CFR 60-Dc.45c (a)	107	Compliance and Performance Test Methods and Procedures for Particulate Matter.
U-00010/-/OIL	40CFR 60-Dc.46c (e)	108	Exemption from Emission Monitoring for Sulfur Dioxide.
U-00010/-/OIL	40CFR 60-Dc.48c (d)	109	Reporting and Recordkeeping Requirements.
U-00010/-/OIL	40CFR 60-Dc.48c (e) (11)	110	Reporting and Recordkeeping requirements - fuel supplier certifications
U-00010/-/OIL	40CFR 60-Dc.48c (f) (1)	111	Reporting and Recordkeeping Requirements (distillate oil).
U-00010	40CFR 60-Dc.48c (g)	100	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63-DDDDD	30	Boilers and Process Heaters Major Source NESHAP rule
FACILITY	40CFR 63-DDDDD.7500	31, 32, 33, 34	ICI Boiler Major Source NESHAP - Emission and Operating Limits and Work Practice Standards
FACILITY	40CFR 63-DDDDD.7510 (e)	35	ICI Boiler Major Source NESHAP - Initial Compliance Date for Existing Sources
FACILITY	40CFR 63-DDDDD.7515 (d)	36	ICI Boiler Major Source NESHAP - Boiler Tune-ups
FACILITY	40CFR 63-DDDDD.7545 (e)	37	ICI Boiler Major Source NESHAP - Notification of Compliance Status
FACILITY	40CFR 63-DDDDD.7545 (h)	38	ICI Boiler Major Source NESHAP - Fuel

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FACILITY	40CFR 63- DDDDD.7550 (b)	39	Switching Notification ICI Boiler Major Source NESHAP - Reporting Requirements
FACILITY	40CFR 63-DDDDD.7555	40	ICI Boiler Major Source NESHAP - Recordkeeping
FACILITY	40CFR 63- UUUUU.10000 (c)	45	Coal and Oil Fired EGU NESHAP - Limited Use Boiler Requirements
FACILITY	40CFR 63-UUUUU.10001	46	Coal and Oil Fired EGU NESHAP - Affirmative Defense for Malfunctions
FACILITY	40CFR 63-UUUUU.10021	47	Coal and Oil Fired EGU NESHAP - Continuous Compliance
FACILITY	40CFR 63-UUUUU.10030	48	Coal and Oil Fired EGU NESHAP - Notifications
FACILITY	40CFR 63-UUUUU.10031	49	Coal and Oil Fired EGU NESHAP - Reporting Requirements
FACILITY	40CFR 63- UUUUU.10031 (c)	50	Coal and Oil Fired EGU NESHAP - Compliance Reports
FACILITY	40CFR 63-UUUUU.10032	51	Coal and Oil Fired EGU NESHAP - Recordkeeping
FACILITY	40CFR 63-UUUUU.10033	52	Coal and Oil Fired EGU NESHAP - Form of Records
FACILITY	40CFR 63- UUUUU.9991 (a) (41, 42, 43, 44	Coal and Oil Fired EGU NESHAP - Emission Limits and Work Practice Standards
FACILITY	40CFR 63-ZZZZ	53	Reciprocating Internal Combustion Engine (RICE) NESHAP COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64	54	
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 72	55	Permits regulation
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	113	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the

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FACILITY	6NYCRR 201-3.2 (a)	13	air
FACILITY	6NYCRR 201-3.3 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	22, 56, 57	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4 (a) (4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Recordkeeping and Reporting of Compliance Monitoring Records of
FACILITY	6NYCRR 201- 6.4 (c) (3) (ii)	5	Monitoring, Sampling and Measurement Reporting
FACILITY	6NYCRR 201-6.4 (d) (4)	23	Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Compliance Certification
FACILITY	6NYCRR 201-7	58	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18, 19	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
U-00005	6NYCRR 207.3 (d)	59	Emission Statements - record keeping requirements.
U-00006	6NYCRR 207.3 (d)	74	Episode actions
FACILITY	6NYCRR 211.1	24	Episode actions
FACILITY	6NYCRR 211.2	114	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 215.2	9	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 225-1.2	25	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (e)	26	Sulfur-in-Fuel Limitations
U-00009/-/P91	6NYCRR 227.2 (b) (1)	95	Sulfur-in-Fuel Limitations
U-00010/-/OIL	6NYCRR 227.2 (b) (1)	101	Particulate emissions.
U-00005	6NYCRR 227-1.2 (a) (1)	60	Particulate emissions.
U-00006	6NYCRR 227-1.2 (a) (1)	75	Particulate Emissions from Liquid Fuels.
FACILITY	6NYCRR 227-1.3	27	Particulate Emissions from Liquid Fuels.
U-00009	6NYCRR 227-1.3	93	Smoke Emission Limitations.
			Smoke Emission



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U-00010	6NYCRR 227-1.3	98	Limitations.
U-00005/00005	6NYCRR 227-1.3 (a)	72	Smoke Emission Limitations.
U-00006/00006	6NYCRR 227-1.3 (a)	91	Smoke Emission Limitations.
U-00005/00005	6NYCRR 227-1.4 (b)	73	Smoke Emission Limitations.
U-00006/00006	6NYCRR 227-1.4 (b)	92	Stack Monitoring
U-00005	6NYCRR 227-2.5 (b)	61	Stack Monitoring System averaging plan.
U-00006	6NYCRR 227-2.5 (b)	76	System averaging plan.
U-00005	6NYCRR 227-2.5 (c)	62, 63	Alternative RACT option.
U-00006	6NYCRR 227-2.5 (c)	77, 78	Alternative RACT option.
U-00009	6NYCRR 227-2.5 (c)	94	Alternative RACT option.
U-00010	6NYCRR 227-2.5 (c)	99	Alternative RACT option.
U-00005	6NYCRR 227-2.6	64, 65, 66	Testing, monitoring, and reporting requirements
U-00006	6NYCRR 227-2.6	79, 80, 81	Testing, monitoring, and reporting requirements
FACILITY	6NYCRR 230.5	28	Gasoline dispensing sites - recordkeeping and reporting.
FACILITY	6NYCRR 242	115	CO2 Budget Trading Program
U-00005	6NYCRR 249.3 (a)	67, 68, 69, 70	BART Emission Limitation
U-00006	6NYCRR 249.3 (a)	82, 83, 84, 85	Requirements for Sources
U-00005	6NYCRR 249.3 (a)	71	BART Emission Limitation
U-00006	6NYCRR 249.3 (a)	86	Requirements for Sources
U-00005	6NYCRR 249.3 (f)	71	Each BART determination established by the Department will be submitted to the EPA for approval as a SIP revision.
U-00006	6NYCRR 249.3 (f)	86	Each BART determination established by the Department will be submitted to the EPA for approval as a SIP revision.

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.



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6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine



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whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to



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be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, OSWEGO HARBOR POWER has been determined to be subject to the following regulations:

40 CFR 60.42c (h)

40 CFR 60.42c (i)

40 CFR 60.43 (a) (1)

40 CFR 60.43c (c)

40 CFR 60.43c (d)



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40 CFR 60.44 (a) (1)

40 CFR 60.44 (a) (2)

40 CFR 60.44 (b)

40 CFR 60.44c (h)

40 CFR 60.45c (a)

40 CFR 60.46c (e)

40 CFR 60.48c (d)

40 CFR 60.48c (e) (11)

40 CFR 60.48c (f) (1)

40 CFR 60.48c (g)

40 CFR 63.10000 (c) (2) (iv)

This condition states the requirements with which a limited use boiler must comply.

40 CFR 63.10001

This condition states the requirements to assert an affirmative defense to a claim for civil penalties for exceedances caused by a malfunction

40 CFR 63.10021

This condition states the requirements for a facility to demonstrate continuous compliance with subpart UUUUU.

40 CFR 63.10030



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This condition states the notification requirements for coal and oil fired electric generating units

40 CFR 63.10031

This condition states the reporting requirements for coal and oil fired EGUs subject to subpart UUUUU.

40 CFR 63.10031 (c)

This condition states the information required in a compliance report.

40 CFR 63.10032

This condition states the recordkeeping requirements for coal and oil fired EGUs subject to subpart UUUUU.

40 CFR 63.10033

This condition states what form and how long records must be retained.

40 CFR 63.7500

Two conditions impose CO and total selected metals limits found in the industrial boiler MACT standard.

40 CFR 63.7510 (e)

This condition states that the owner or operator must demonstrate initial compliance no later than 180 days after the compliance date.

40 CFR 63.7515 (d)

This regulation requires facilities with industrial, commercial or institutional boilers to tune-up their boilers on an annual, biennial, or every five years basis.

40 CFR 63.7545 (e)

This condition states the requirements of the notification of compliance status.

40 CFR 63.7545 (h)



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This condition states the notification requirements for owners and operators intending to switch fuel subcategories

40 CFR 63.7550 (b)

This condition states when reports must be submitted.

40 CFR 63.7555

A condition in the permit specifies what records to maintain, and for how long.

40 CFR 63.9991 (a) (1)

These conditions state the emission limits and work practice standards that apply to coal and oil fired electric generating units. In particular, an HF limit, a PM limit, an HCl limit, and a mercury limit.

40 CFR Part 60, Subpart A

40 CFR Part 63, Subpart DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

40 CFR Part 63, Subpart ZZZZ

The permit includes a general condition requiring the owner to comply with 40 CFR Part 63, Subpart ZZZZ.

40 CFR Part 64

40 CFR Part 72

6 NYCRR 207.3 (d)

6 NYCRR 211.1



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6 NYCRR 225-1.2

This section of the regulation establishes sulfur-in-fuel limitations residual oil and distillate oil.

6 NYCRR 225-1.2 (e)

Sulfur-in-fuel limitations for residual oil in the remainder of the State on or after July 1, 2014.

6 NYCRR 227.2 (b) (1)

6 NYCRR 227-1.2 (a) (1)

6 NYCRR 227-1.3

6 NYCRR 227-1.3 (a)

6 NYCRR 227-1.4 (b)

6 NYCRR 227-2.5 (b)

6 NYCRR 227-2.5 (c)

6 NYCRR 227-2.6

6 NYCRR 230.5

The facility operates a gasoline dispensing site and is required to keep records of the gasoline delivered.

6 NYCRR 249.3 (a)

6 NYCRR 249.3 (f)

6 NYCRR Part 242

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6 NYCRR Subpart 201-7

Compliance Certification
Summary of monitoring activities at OSWEGO HARBOR POWER:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	29	record keeping/maintenance procedures
U-00006	87	continuous emission monitoring (cem)
U-00006	88	continuous emission monitoring (cem)
U-00006	89	continuous emission monitoring (cem)
U-00006	90	record keeping/maintenance procedures
U-00010/-/OIL	104	monitoring of process or control device parameters as surrogate
U-00010/-/OIL	107	monitoring of process or control device parameters as surrogate
U-00010/-/OIL	109	record keeping/maintenance procedures
U-00010/-/OIL	110	record keeping/maintenance procedures
U-00010/-/OIL	111	record keeping/maintenance procedures
U-00010	100	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	intermittent emission testing
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	41	intermittent emission testing
FACILITY	42	intermittent emission testing
FACILITY	43	intermittent emission testing
FACILITY	44	intermittent emission testing
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-00010	96	monitoring of process or control device parameters as surrogate
U-00010	97	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
FACILITY	26	work practice involving specific operations
U-00009/-/P91	95	intermittent emission testing
U-00010/-/OIL	101	intermittent emission testing
U-00005	60	intermittent emission testing
U-00006	75	intermittent emission testing
FACILITY	27	record keeping/maintenance procedures
U-00009	93	monitoring of process or control device parameters

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U-00010	98	as surrogate monitoring of process or control device parameters as surrogate
U-00005/00005	72	monitoring of process or control device parameters as surrogate
U-00006/00006	91	monitoring of process or control device parameters as surrogate
U-00005/00005	73	record keeping/maintenance procedures
U-00006/00006	92	record keeping/maintenance procedures
U-00005	61	record keeping/maintenance procedures
U-00006	76	record keeping/maintenance procedures
U-00005	62	monitoring of process or control device parameters as surrogate
U-00005	63	continuous emission monitoring (cem)
U-00006	77	continuous emission monitoring (cem)
U-00006	78	monitoring of process or control device parameters as surrogate
U-00009	94	continuous emission monitoring (cem)
U-00010	99	continuous emission monitoring (cem)
U-00005	64	record keeping/maintenance procedures
U-00005	65	record keeping/maintenance procedures
U-00005	66	record keeping/maintenance procedures
U-00006	79	record keeping/maintenance procedures
U-00006	80	record keeping/maintenance procedures
U-00006	81	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	115	record keeping/maintenance procedures
U-00005	67	record keeping/maintenance procedures
U-00005	68	monitoring of process or control device parameters as surrogate
U-00005	69	continuous emission monitoring (cem)
U-00005	70	monitoring of process or control device parameters as surrogate
U-00006	82	continuous emission monitoring (cem)
U-00006	83	monitoring of process or control device parameters as surrogate
U-00006	84	monitoring of process or control device parameters as surrogate
U-00006	85	record keeping/maintenance procedures
U-00005	71	record keeping/maintenance procedures
U-00006	86	record keeping/maintenance procedures

Basis for Monitoring

The facility is required to monitor emissions of opacity, fuel sulfur, and oxides of nitrogen.